

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TRAFFIC SPORTS USA

Plaintiff,

INDEX NO. 11-CV-1454

-against-

MODELOS RESTAURANTE, INC.
d/b/a SAJUMA RESTAURANT LOUNGE

Defendant,

REQUEST TO ENTER
DEFAULT JUDGMENT

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To: Douglas C. Palmer, Clerk
United States District Court
Eastern District of New York

Please enter the default judgment of defendant, Modelos Restaurante, Inc, d/b/a Sajuma Restaurant Lounge, pursuant to Rule 55 of the Federal Rules of Civil Procedure for failure to plead or otherwise defend this action as fully appeared from the Court file herein and from the attached Affirmation In Support by Paul J. Hooten.

Date: January 24, 2012

By: /s/ Paul J. Hooten
Paul J. Hooten, Esq. (PJH9510)
The Law Firm of Paul J. Hooten & Associates
5505 Nesconset Hwy., Suite 203
Mt. Sinai, NY 11766
(631) 331-0547

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
TRAFFIC SPORTS USA

Plaintiff,

INDEX NO. 11-CV-1454

-against-

MODELOS RESTAURANTE, INC.
d/b/a SAJUMA RESTAURANT LOUNGE
Defendant,

NOTATION OF DEFAULT

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I, Douglas C. Palmer, Clerk of the Court of the United States District Court for the Eastern District of New York, do hereby certify that the defendant has not filed an answer or otherwise moved with respect to the complaint herein. The default of defendant Modelos Restaurante, Inc. d/b/a Sajuma Restaurant Javier Rivera is hereby noted pursuant rule 55(a) of the Federal Rules of Civil Procedure.

Dated: Central Islip, New York, 11722
January 20, 2012

Douglas C. Palmer
Clerk of Court

By: /s/ Keith A. Jones
Deputy Clerk

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
TRAFFIC SPORTS USA

Plaintiff,

INDEX NO. 11-CV-01454

-against-

MODELOS RESTAURANTE, INC.
d/b/a SAJUMA RESTAURANT LOUNGE

AFFIDAVIT FOR JUDGMENT
BY DEFAULT

Defendant,
-----X

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Paul J. Hooten, being duly sworn, deposes and says:

I am a member of the Bar of this Court and am associated with the firm of Paul J. Hooten & Associates, attorney for plaintiff in the above-entitled action and I am familiar with all the facts and circumstances in this action.

1. I make this affidavit pursuant to Rule 55.1 and 55.2(a) of the Civil Rules for the Eastern District of New York, in support of plaintiff's application for the entry of a default judgment against defendant.

2. This is an action to recover the unauthorized exhibition of the telecast of the March 28, 2009, CONCACAF World Cup Qualifier Tournament by the defendant at its establishment. See attached summons and complaint attached hereto as Exhibit "A".

3. This action was commenced on March 24, 2011 by the filing of the summons and complaint. A copy of the summons and complaint was served on Modelos Restaurante, Inc.

d/b/a Sajuma Restaurant Lounge on April 22, 2011 by service on Lisa Vorraro , a person who is know to be an Authorized Agent. The defendant has not answered the complaint and the time for the defendant to answer the complaint has expired.

4. This action seeks judgment in the amount of \$12,072.75, plus interest at 9% from March 28, 2009, amounting to \$3,078.55, plus costs and disbursements of this action in the amount of \$470.00 amounting in all to \$15,621.30.

WHEREFORE, plaintiff requests the entry of Default and the entry of the annexed Judgment against defendant.

Dated: Mt. Sinai, New York
January 16, 2012

By: /s/ Paul J. Hooten
Paul J. Hooten (PJH 9510)

Sworn to before me this
16th day of January, 2012

/s/ Cheryl E. Lorefice
Notary Public

Cheryl E. Lorefice
Notary Public, State of New York
No. 4999823
Qualified in Suffolk County
Commission Expires August 3, 2014

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

TRAFFIC SPORTS USA

Plaintiff,

INDEX NO. 11-CV-1454

-against-

MODELOS RESTAURANTE, INC.

d/b/a SAJUMA RESTAURANT LOUNGE

Defendant,

STATEMENT OF DAMAGES

-----X

Amount of judgment \$12,072.75

Interest at 9% from March, 2009 through January, 2012..... \$ 3,078.55

Costs and Disbursements:

Clerk's fee \$ 350.00

Process server fees \$ 120.00

Total as of January, 2012 \$15,621.30

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TRAFFIC SPORTS USA

Plaintiff,

INDEX NO. 11-CV-1454

-against-

MODELOS RESTAURANTE, INC.
d/b/a SAJUMA RESTAURANT LOUNGE
Defendant,
-----X

DEFAULT JUDGMENT

The summons and complaint having been duly served on defendant, Modelos Restaurante, Inc. d/b/a Sajuma Restaurant Lounge on on April 22, 2011; that defendant Modelos Restaurante, Inc. d/b/a Sajuma Restaurant Lounge, having failed to plead or otherwise defend in this action; that the default having been duly noted, and that upon the annexed affidavit in support of the default judgment it is;

ORDERED AND ADJUDGED, that plaintiff Traffic Sports USA, do recover from defendant, Modelos Restaurante, Inc. d/b/a Sajuma Restaurant Lounge, the sum of \$12,072.75, with interest at 9% from March 28, 2009, amounting to \$3,078.55; plus costs and disbursements of \$470.00, for a total judgment in the amount of \$15,621.30, plus post- judgment interest at the rate at the date of this judgment.

Dated: _____

SO ORDERED:

Arthur D. Spatt
United States Bankruptcy Judge

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
TRAFFIC SPORTS USA

Plaintiff,

INDEX NO. 11-CV-1454

-against-

MODELOS RESTAURANTE, INC.

d/b/a SAJUMA RESTAURANT LOUNGE

CERTIFICATE OF SERVICE

Defendant,
-----X

I certify that a copy of the Request To Enter Default Judgment, Notation Of Default, Affidavit For Judgment By Default, Statement Of Damages and Judgment was sent via the U.S. Postal Service certified mail within the State of New York, First Class Mail addressed to the following on January 24, 2012:

To: Modelos Restaurante, Inc.
d/b/a Sajuma Restaurant Lounge
1770 New York Avenau
Huntington Station, NY 11746

By: /s/ Lucille Eichler
Lucille Eichler
Paul J. Hooten & Associates
5505 Nesconset Highway, Suite 203
Mt. Sinai, NY 11766